

**FILED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

**AUG 08 2017**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
BENTON OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D'MARIO THOMPSON,

Defendants.

CRIMINAL NO. 17-CR-30134-NJR

Title 18 United States Code §§1951(a),  
924(c)(1)(A)(ii).

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**Interference with Commerce by Robbery**

1. On or about April 20, 2017, in St. Clair County, within the Southern District of Illinois,

**D'MARIO THOMPSON,**

Defendant herein, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that:

- (a) D'Mario Thompson did unlawfully take and obtain personal property consisting of United States currency proceeds of Dollar General's business activities, from the person and presence of the employees of Dollar General, against their will by means of actual and threatened force, violence, and fear of injury to their person by brandishing a firearm.
- (b) At all times material to this Indictment, Dollar General was engaged in selling goods, foodstuffs, and other products to customers after obtaining their products from vendors and

distribution centers outside of the state of Illinois and engaged in and affecting interstate commerce.

All in violation of Title 18, United States Code, Section 1951.

**COUNT 2**

**Interference with Commerce by Robbery**

2. On or about May 17, 2017, in St. Clair County, within the Southern District of Illinois,

**D'MARIO THOMPSON,**

Defendant herein, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that:

- (c) D'Mario Thompson did unlawfully take and obtain personal property consisting of United States currency proceeds of CC Food Mart's business activities, from the person and presence of the employee of CC Food Mart, against her will by means of actual and threatened force, violence, and fear of injury to her person by brandishing a firearm.
- (d) At all times material to this Indictment, CC Food Mart was engaged in selling fuel, goods, foodstuffs, and other products to customers after obtaining their products from vendors and distribution centers outside of the state of Illinois and engaged in and affecting interstate commerce.

All in violation of Title 18, United States Code, Section 1951.

**COUNT 3**

**Brandish a Firearm During a Crime of Violence**

3. On or about April 20, 2017, in St. Clair County, within the Southern District of Illinois,

**D'MARIO THOMPSON,**

Defendant herein, did knowingly brandish, carry and use a firearm during and in relation to, and did knowingly possess a firearm in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as named and more fully described in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

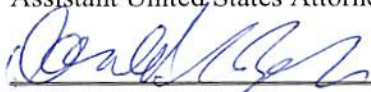
**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Counts 1 through 3, inclusive, of this indictment,

**D'MARIO THOMPSON,**

shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and any and all ammunition contained within the firearms or seized with the firearms and involved in or used in any knowing violation of 18 U.S.C. § 924, including, but not limited to, the following a semi-automatic pistol.

  
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JENNIFER HUDSON  
Assistant United States Attorney

  
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DONALD S. BOYCE  
United States Attorney

Recommended Bond: DETENTION